

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

MYRA BROWN and ALEXANDER  
TAYLOR,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF EDUCATION;  
MIGUEL CARDONA, in his official  
capacity as the Secretary of Education,

*Defendants.*

CIVIL ACTION NO. 4:22-cv-908

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs Myra Brown and Alexander Taylor hereby move for a preliminary injunction enjoining the United States Department of Education and Secretary of Education Miguel Cardona (“Defendants”) from enforcing, applying, or implementing the Debt Forgiveness Program anywhere within the Department’s jurisdiction. As set forth in the accompanying brief in support, Plaintiffs are likely to prevail on the merits; Plaintiffs will suffer irreparable harm absent an injunction; the balance of equities tips in their favor; and an injunction is in the public interest.

Expedited relief is needed because the Department has stated that it will start cancelling student loan debt as early as Sunday, October 23. *See App. 39.*

WHEREFORE, for the reasons set forth in the accompanying brief, Plaintiffs respectfully request that the Court issue a preliminary injunction enjoining the Defendants from enforcing, applying, or implementing the Debt Forgiveness Program anywhere within the Department’s jurisdiction.

Dated: October 10, 2022

Respectfully submitted,

/s/ James F. Hasson

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2022, I electronically filed the foregoing document through the Court's ECF system and will serve a copy on each of the Defendants according to the Federal Rules of Civil Procedure.

/s/ James F. Hasson  
James F. Hasson

**CERTIFICATE OF CONFERENCE**

Plaintiffs' counsel were unable to confer with Defendants' counsel because no counsel has appeared for Defendants.

/s/ James F. Hasson  
James F. Hasson